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KAWERAK , INC. ○ P.O. Box 948 ○ Nome, AK 99762

TEL: (907) 443-5231 • FAX: (907) 443-4452

SERVING THE VILLAGES OF:
BREVIG MISSION
COUNCIL
DIOMEDE
ELIM
GAMBELL
GOLOVIN
KING ISLAND
KOYUK
MARY'S IGLOO
NOME
SAVOONGA
SHAKTOOLIK
SHISHMAREF
SOLOMON
STEBBINS
ST MICHAEL
TELLER
UNALAKLEET
WALES
WHITE MOUNTAIN

WC- 10-90
GN- 09-51
WC- 05-337

Commissioner's Secretary
Office of the Secretary
Federal Communication Commission
445 12th St., SW
Washington, DC 20554

Received & Inspected
JUL - 7 2010
FCC Mail Room

To Whom It May Concern,

Please find the enclosed comments on FCC 10-58 from Kawerak Inc., the non-profit tribal consortia in the Bering Strait Region.

If you have any questions regarding this document, please feel free to contact Pearl Mikulski at 907-443-4245 or by email at pmikulski@kawerak.org. Thank you for your time and consideration.

Respectfully,

Loretta Bullard, President
Kawerak, INC

cc: Pearl Mikulski, Community Services Vice President
Kathy Marx, Senior Planner
Summer Larsen, IT Manager
Tom Bunger, B2Networks
Heather Hudson, UAA, ISER

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Kawerak, Inc. Comments on the NOI – FCC 10-58 – National Broadband Plan

Docket Numbers: WC Docket No. 10-90, GN Docket No. 09-51 and WC Docket No. 05-337

Summary of the Notice of Inquiry and the National Broadband Plan

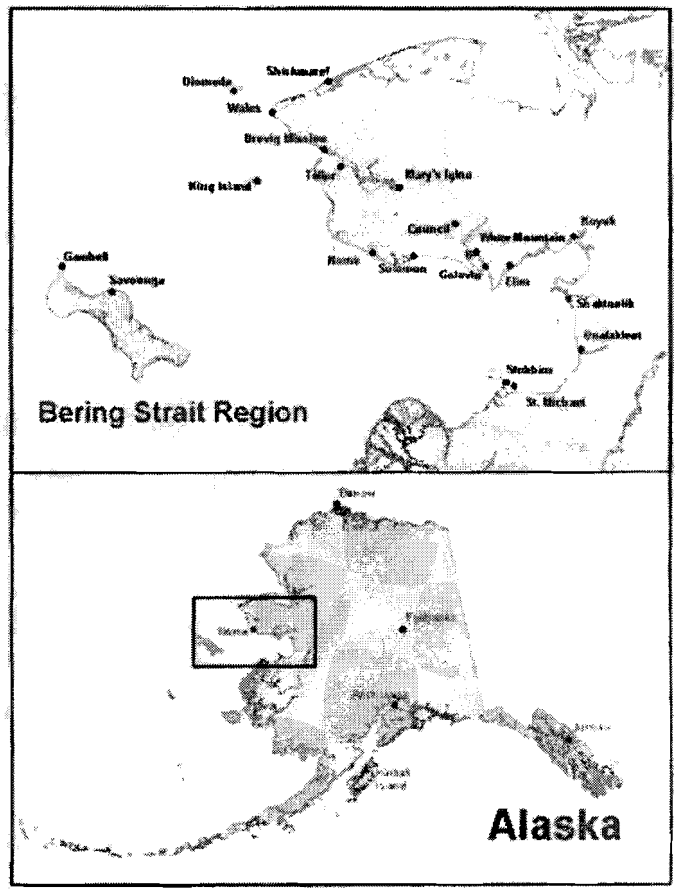
Purpose of the National Broadband Plan: "to support the provision of broadband communications in areas that would be unserved without such support or that depend on universal support for the maintenance of existing broadband service."

Kawerak understands that the NOI requests:

1) Comment on whether the Commission should use a model to help determine universal service support levels in areas where there is no private sector business case to provide broadband and voice services
2) Comment on the best way to create an accelerated process to target funding toward new deployment of broadband networks in unserved areas
3) Notice of Proposed Rulemaking (NPRM) seeks comment on specific common-sense reforms to cap growth and cut inefficient funding in the legacy high-cost support mechanisms and to shift the savings toward broadband communications

Kawerak is the regional non-profit organization serving the 20 Alaska Native tribes in the Bering Strait Region of Alaska. Kawerak operates in the hub community of Nome, Alaska. Kawerak has 164 employees and manages an annual budget of over $32,000,000. Communication is vital in this region because the 16 villages in the region are not connected by roads, and even the hub community of Nome does not have terrestrial internet options and must rely on satellite systems which have distinct disadvantages.

Kawerak, Inc. is pleased that the FCC encourages input from Tribal governments on all of these issues. We take this opportunity to provide comment on the National Broadband Plan FCC 10-58 in hopes that unique approaches will be taken to improve connectivity in this region.



Kawerak has three primary concerns:

1. The validity of the data for the Bering Strait region which incorrectly identifies this region as not having a gap in high speed internet availability.
2. Because the remoteness of this region will require a satellite system which is more costly than the terrestrial systems elsewhere, provider subsidies will be inevitable to encourage providers to build out the systems to provide high speed access in this region.
3. The residents of our rural communities are some of the most impoverished people in the Unites States, yet the remoteness of the region makes access to high speed of vital importance. The National Broadband Plan needs to take this issue into account if they are going to assure high speed internet access in this region.

Introduction:

The Bering Strait Region in Northwestern Alaska

The Bering Strait Region covers an area of 23,000 square miles in western Alaska, and includes St. Lawrence and Diomede Islands. It is roughly the size of West Virginia. The City of Nome serves as the regional government, transportation and service hub for 20 tribes in 15 surrounding villages which are on the coasts of Norton Sound, the Bering Sea and the Chukchi Sea. Six of the 16 communities in the region do not have water and sewer systems. Nome is served by daily jet service and is unconnected to other areas of Alaska by road. Three villages are connected to Nome via a regional road system. The remaining villages are only accessible by airplane, boat or snow machine.

Village economies are based on subsistence supplemented by some wage earnings or transfer payments. There are few employment opportunities. Limited jobs available include: a postmaster, school employees, part-time airline agents, health aides, village store and local government employees. Summer employment consists of jobs in construction and some commercial fishing. Eleven of the region's villages do not participate in the five-year limit for TANF welfare recipients because unemployment rates are over 50% in those communities. The Alaska Department of Labor estimates that up to 22.6% of the region's population lives at or below the poverty line. It is very difficult to make ends meet as this region has one of the highest cost of living rates in the nation. A recent University of Alaska survey found that food costs in some of our communities were 270% of Portland, Oregon. Extremely high energy costs are affecting the delivery of services for everyone.

Seventy five percent of the Region's 9,500 population[1] are Inuit (Eskimo), either Inupiat, St. Lawrence Island Yu'pik or Central Yupik. The population is very young. Almost half (45%) of the population is 19 years old and younger. Twenty percent of all residents are between the ages of 20 and 34.[2] While education rates are improving, many people over 50 received limited schooling. In some villages, nearly two out of three adults have not graduated from high school or earned a general equivalency degree.

The Bering Strait Region has a unique Inuit cultural history and tradition that provide the foundation for working together to meet the many challenges we face.

[1] Alaska Department of Labor and Workforce Development 2005

[2] Alaska Native Policy Center, October 2003, "Alaska Native Kindergarten-12 Education Indicators"

Kawerak, Inc., in Nome Alaska

Kawerak, Inc. is a Native non-profit association organized to promote the social and economic welfare of residents in 20 tribes in the Bering Strait Region. Kawerak's Vision Statement serves as the guiding principal for Kawerak's role and function in the region: "Building on the inherent strength of our cultural values, we shall assist our tribes to control and create their future." In keeping with this Vision Statement, Kawerak is providing more training and technical assistance at the village level.

Kawerak's Program include: Education, Employment & Training (Community Education, Employment & Training, Child Care, General Assistance); Community Services (Tribal Affairs, Community Planning and Development, Village Public Safety Officer Program); Children & Family Services (Children & Family Services, Child Advocacy Center, Head Start, Wellness); Natural Resources (Eskimo Heritage Program, Reindeer Herders Association, Eskimo Walrus Commission, Fisheries, Subsistence Resources, Land Management Services), and Administrative (Legal, Information Systems, Accounting, Planning, Transportation, and Beringia Museum of Culture and Science).

Historical Internet Connectivity Problems for Kawerak, Inc.

Nome's first internet was provided to Northwest Campus in the early 1990's. There were only a few lines and it was a dialup connection that only text based users could use. Soon after Prodigy provided a residential dialup service that was very costly due to the long distance phone costs. AT&T provided support to the schools, hospital, and other commercial customers. Two local providers provided residential dialup service in the mid 1990's, but they went out of business when GCI came in providing less expensive dialup and higher speed cable modem service in the late 1990's. Since that time other internet providers have become available like Starband, TelAlaska, and HughesNet, but GCI remains the primary provider in Nome for residential internet services. GCI and the other providers are satellite based systems that cannot offer the FCC definition of high speed internet. The highest speed available in Nome is 3mb/1mb (see the GCI package information – attachment B).

In the early 1990's Kawerak partnered with the regional health corporation to use 56K of a T1 (private line) from AT&T to provide connectivity between the Nome-based Kawerak offices and the village-based Kawerak programs. This system was slow and expensive (about $800 per month per site). Kawerak now purchases directly from AT&T. The current system is somewhat better and less expensive. Actual internet speeds are 100 to 200 KB which is .1 to .2 MB, well below the high speed definition (see Kawerak speed test – attachment C). Furthermore, the connections are unreliable (see the Kawerak internet availability chart- attachment D). On multiple occasions, GCI's village internet has been out of service for several days in a row. This affects Kawerak's ability to download files, share documents, and access online training videos and sound. Village connectivity problems also increase the costs of Kawerak's phone bills, fax line costs, mail, and freight (hand carries) which are necessary to provide services to the surrounding communities.

In 2003 Kawerak received US Dept. of Commerce BTOP funding for a project called "Wireless Walrus", where touch screen computers were placed in each tribal office for the public to have access to the internet. A few years later Kawerak received an Alaska Manufacturing Extension Partnership (AMEP) grant to set up public use e-commerce centers in Nome and 7 villages. Kawerak undertook these projects because the schools and village public libraries where not

offering public access to the internet. Kawerak wanted to help village residents who wanted to buy and sell goods, obtain services, and have access to information. Internet speeds were and continue to be very slow, and there is little technical support at the local level. Yet despite the challenges, tribes have worked hard to maintain this service to the community. Some of the equipment is still in use by the public even though it is at the end of its useful life. This year a US Treasury grant allowed Kawerak to replace the computers for the 8 e-commerce centers. Kawerak currently has submitted 2 grant applications to improve internet services in the villages. One is Round Two of the stimulus funding "BTOP" opportunity to provide an earth station and wireless access points so all tribal offices and Kawerak programs and public use centers can have more reliable internet access. Another USDA Rural Business Enterprise Grant (RBEG) will add 8 more village-based public use e-commerce centers in this region.

Historical Internet Connectivity Problems of the Bering Strait Villages

GCI is the primary provider of residential internet services in this region. However, GCI (www.gci.com) was slow to provide internet in our villages, probably due the sheer cost effectiveness of it. It is a lot of equipment, staff, overhead, for the small number of consumers per village. Village populations in this region range from 145-750. Plus the harsh weather conditions are very hard on equipment. Maintenance costs are high because local staff are not available to deal with the technical repairs and issues. In the days of dialup (pre-2006 for the villages), there was extreme lag due to the double hop to Anchorage over satellites to get information sent over the internet. Even with so call "high speed Wireless Internet Satellite Points (WISP)", it is barely better than dialup speed in the villages with the GCI advertised speeds of 256kb/56kb (see the GCI website information – attachment A). Actual speeds are about 100kb which is .1MB. Also GCI put in a special access system in the villages that is not used in Nome. It only allows ONE computer per household to connect unless they pay extra for multiple users, rather than "metering" the bandwidth and charging accordingly like they do in Nome. This was probably an effort to assure securing as many customers as possible and prevent neighbors from jumping on unsecure residential networks.

AT&T was the first to support the infrastructure that schools and clinics in this region needed for internet connectivity. Schools and clinics are by far the biggest users of data/internet services in the villages, mainly because of the USAC (eRate and RHCD) programs. AT&T is probably the most effective current internet provider in the villages as they have been there the longest. AT&T does offer some residential service, but historically only provided minimal service to the rest of the commercial and non-commercial customers in the village. The cities and tribal offices were not offered much in the way of discounts for internet service. Also the internet service provided by AT&T, when it was available to non-school or non-clinic agencies, was at very low speeds and unreliable because the bulk of the bandwidth was dedicated to the school and clinic, leaving the rest to share a very small piece of the bandwidth capacity. AT&T does have plans to set up residential access in four villages, but has not launched the service yet. AT&T currently provides internet links to three tribal offices as a test. The AT&T connections in these villages have been better-performing than the GCI WISP service, but does not come close to the defined target high speed rate of 4Mbps.

The arrival of GCI's new WISP service, Starband, HughesNet and TelAlaska (Nome only) have increased availability to obtain slightly higher speeds, but village set-up costs are high as the consumers must purchase the antenna's or dishes to install it. Set up costs range from a $300-1500 one-time fee, and the monthly single user service costs are about $50 a month, which is lower than Nome. While $50 a month sounds reasonable, the village service is slow, spotty, and

can have unexplained outages for weeks. Village residents receive no refunds for long term outages of service. Most families cannot afford $50 a month year round and often end up turning the service on and off depending on seasonal work and subsistence hunting schedules.

It's unfortunate that rural consumers do not enjoy the same customer support as Nome-based customers. Excuses by all the current village internet providers for poor service range from "sun spots" to "icing of equipment" (for weeks at a time) or "we are sending out a tech next week" (next week really means next month), to "perhaps your equipment at your house is failing" (when no one in the village who is using that provider can connect either).

Tribes have limited funding sources and many local responsibilities, so Kawerak has borne the burden of the expense of providing internet to the village tribal offices and other Kawerak programs like: Indian Child Welfare (ICWA) workers, Head Start programs, community education programs, and the Village Police Officers (VPSO). Kawerak currently has multiple user GCI WISP connection in most villages. But some villages (Diomede, Wales, and Shishmaref) have never had reliable service despite all efforts and looking into various options. City governments and clinics also operate on very limited budgets and often do not have internet connectivity. While these are not Kawerak supported agencies, we do work with these agencies on various projects. The connectivity problem reduces the efficiency of our collaboration to provide services in the rural communities.

On a statewide level the Northern Fiber Optic Cable project is underway to some degree and would provide fiber from Kodiak to Deadhorse by going up the coast (and would have landing in Bethel, Nome, Kotzebue, Barrow and a few other coastal hubs.) That project has applied for ARRA funds. While this would not directly connect the villages in the region, the fact that there would be fiber to Nome would make bringing higher speed internet to the villages closer to being a reality. Kawerak's board has offered a resolution of support to this project (see the support letter and resolution – attachment E and F).

Comments to the FCC 10-58 National Broadband Plan

Comment 1: Based on the information available in the NOI and OBI technical paper, Kawerak (the Bering Strait Region's tribal consortia) cannot support the FCC's proposed use of the analysis and economic model to estimate the broadband availability gap in unserved areas or expansion of existing areas served by broadband for the following reasons:

- Chapter II. Broadband Availability, OBI Technical Paper No. 1, [p.17, paragraphs 2,3] indicates,

> "The complexity of this analysis is driven by the need for a very granular geographic view of the capabilities of all the major types of broadband infrastructure as they are deployed today, and as they will likely evolve over the next three to five years without additional public support.
>
> These data are not available: There is a lack of data at the required level of granularity, both in terms of which people have access to which services, and of which people are passed by different types of physical infrastructure. To solve this problem, we combine commercial and public data on availability and infrastructure with statistical techniques to predict or infer the data needed to complete our data set.

In some cases we use broadband availability data to predict the location of broadband infrastructure, and in some cases we use the location of broadband infrastructure to predict the availability of broadband capable networks."

It is unclear how the data was obtained for the Bering Strait Region of Alaska. The Bering Strait Region is depicted throughout the NOI as having an availability of broadband networks capable of meeting the National Broadband target in contrast the entire remainder of the State (with the exception of the Anchorage metropolitan district).

The Bering Strait Region is comprised of 16 communities representing 20 federally recognized Tribes. The area is extremely remote. There is no connectivity with the rest of Alaska's highway system and road systems are typically centralized around small village hubs. Broadband is currently available in each village at the public school through GCI. Dedicated band width to the schools and clinics does not allow the remainder of bandwidth capacity for appropriate speed and connectivity for other businesses and organizations in the villages. Without significant upgrades to the system individual housing units will not be served nor will they reach the National Availability Target download speed of 4Mbps that the NOI purports as a goal. It is incorrect to assume these individual housing units are capable of obtaining broadband services without a significant investment gap.

Very recent data from 15 villages within the Bering Strait Region indicate an upload speed of 0.256Mbps. The hub community of Nome has an upload speed of 0.512Mbps for the average user and up to 3Mbps for premium customers. It is inaccurate that there is no availability gap in the Nome, Alaska census district as depicted in the NOI.

- The NOI indicates[3] that satellite capacity can meet only a small portion of broadband demand in unserved areas in the foreseeable future. The accompanying OBI Technical Paper also indicates that "the capacity of a single satellite will increase dramatically with the next generation of high throughput satellites expected to be launched in the next few years."[4] It is further indicated that even with the increased capacity it will address no more than 3.5% of the unserved within the United States.

  Alaska citizens have long relied on satellite for telecommunications. Given the extreme isolation, lack of transportation corridors and connectivity throughout the state, low population densities, harsh climate and the high cost of providing broadband service to small isolated pockets of rural residential satellite technology continues to be the preferred type of broadband provider for the Bering Strait Region tribal villages.

  Given that the model does "not explicitly include satellite in the base-case calculation"[5] leaves the Bering Strait Region out of the base-case calculation.

[3] FCC 10-58 Notice of Inquiry and Notice of Proposed Rulemaking, p. 11.
[4] FCC OBI Technical Paper No. 1, p. 28
[5] Id p. 94

Comment 2: Costs per satellite subscriber is discussed in the technical paper, p. 92, paragraphs 6-7. It is difficult to imagine rural community residents within the Bering Strait Region, Alaska or other highly remote areas within the United States, able to afford subscriber fees double of those for terrestrial provider fees per month in order to help providers to build out existing capacity and maintain the same return on investment as today for the provider. The assumption that a provider subsidy would be required seems inevitable.

Current village internet fees are $50 per month which is much higher than comparable services in the urban areas like Anchorage and the lower 48. If access to high speed service was improved, the rates could go as high as $100 per month. If this occurred in the Bering Strait region then fewer families would be able to afford access. Unemployment (9.8% according to the 2000 census) and poverty (22.2% of the population lives at or below the poverty level) is very high in the Bering Strait. Families are often forced to disconnect cable TV, phones, and internet due to fluctuations in income due to seasonal jobs or during times of heavy subsistence hunting when they are away from the village.

Comment 3: Lastly, the assumption that the entire capacity build out would connect rural America is unrealistic. The main problem is not only capacity and the ability for households to connect to a network of appropriate download and upload speeds but is that of the ability of residents to afford to connect. Although discussion of the investment gap for providers is addressed, discussion of the ability for some of the most impoverished citizens in the United States to ever be able to afford to connect to **any** internet service is not addressed at all (see page 3-4 for village user connectivity issues).

FOR HOME

WirelessNet
We are all connected

Rural Alaska's Internet Solution

Village Connections

Up to 256/56Kbps - $49.99/mo. -*Single Use*
2 email addresses
5 MB of storage/per email account
Free Email Guard anti-virus & spam protection with each address
5 MB of web space
2,048MB included monthly throughput

Up to 256/56Kbps - $99.99/mo. -*Shared Use**
4 email addresses
5 MB of storage/per email account
Free Email Guard anti-virus & spam protection with each address
10 MB of web space
3,072MB included monthly throughput

Up to 56Kbps - $24.99/mo.
1 email address
5 MB of storage/per email account
1,024MB included monthly throughput

- No need for a second phone line.
- Up to 256K download and 56K upload speed.
- Unlimited live technical support.
- Connect up to 3 computers.
- Monthly data throughput included.
- Free installation

To find out if your area is a WirelessNet serviceable location, please call:

1-800-800-4800

MileagePlan

Get WirelessNet, Get Miles!
Earn Alaska Airlines Miles

*Shared use - up to 3 computers (customer must provide router) $99.99 Activation fee required on all packages. No servers allowed. Other terms and conditions may apply. If you exceed your included monthly MB usage, you will be charged one cent per MB. Equipment costs $299.99 and will be owned by the customer. Sign up for any WirelessNet plan and earn 1 Alaska Airline mile for every dollar spent for access. Current serviceable locations are subject to change without notice.

Attachment B

HIGH SPEED INTERNET PLANS

Nome Only

Locations	Kodiak and Nome	Barrow, Bethel, Cordova	Homer
HyperNet Silver	• 512/64Kbps • 5,120 MB's included usage • 2 emails (5MB each) • 10MB web space • $49.99*	• 384/64Kbps • 4,096 MB's included usage • 2 emails (5MB each) • 10MB web space • $49.99*	• 512/64Kbps • 5,120 MB's included usage • 2 emails (5MB each) • 10MB web space • $39.99*
HyperNet Silver Plus	[illegible]	[illegible]	[illegible]
HyperNet Gold	• 1.5Mbps/192Kbps • 15,360 MB's included usage • 4 emails (5MB each) • 20MB web space • $99.99*	• 1.0Mbps/192Kbps • 12,288 MB's included usage • 4 emails (5MB each) • 20MB web space • $99.99*	• 1.5Mbps/128Kbps • 20,480 MB's included usage • 4 emails (5MB each) • 20MB web space • $84.99*
HyperNet Platinum	[illegible]	[illegible]	[illegible]
Additional MB's	1/2 cent per Megabyte (MB) if you go over your included monthly usage	1 cent per Megabyte (MB) if you go over your included monthly usage	1/2 cent per Megabyte (MB) if you go over your included monthly usage

*All prices are with GCI Long Distance Discount–Add $15 without GCI Long Distance.Please note that packages and pricing vary between markets due to costs to deliver service.

Location	Kodiak
Ultimate Xtreme	• 1.0 Megs/256Kbps • 10,240 MB's included usage • 4 emails • $49.99 a month
Ultimate Xtreme Family	[illegible]
Ultimate Xtreme Entertainment	• 3.0 Megs/384Kbps • 30,720 MB's included usage • 8 emails • $99.99 a month
Ultimate Xtreme Power	[illegible]

Regional Ultimate Xtreme
(only available with The Ultimate Package & The Ultimate Cellular Package). 1/2 cent per Megabyte (MB) if you go over your included monthly usage.

Xtreme Plans require $6.99 monthly access fee or subscription to any cable TV package, plus a one-time set up fee of $24.99.

Attachment C

McAfee

Internet Connection Speedometer

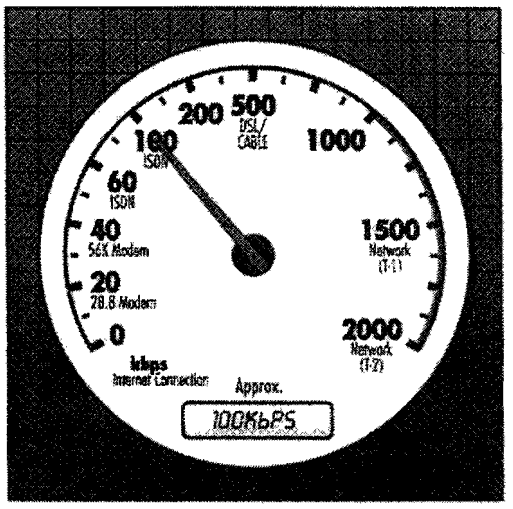
How Fast is Your Internet Connection?

Your Internet Connection Speed Results

File Size 150.005 KB
Time Elapsed 7.36 seconds

View Glossary of Terms

Kaweah Speed Test → 100 MB



Frequently Asked Questions

What is Internet connection speed?

Internet connection speed refers to the data transfer rate from the Internet to your computer. Basically that means the amount of time it takes your computer to download a given amount of data. Internet connection speeds are usually measured in Kbps (kilo**bits** per second, or thousands of bits per second) or KBps (kilo**bytes** per second). Nowadays with the technological improvements in data transfer speeds, Internet connection speeds can also be measured in Mbps (megabits per second, or millions of bits per second) or MBps (megabytes per second). For example, if you had a 28.8K (28,800 bps) modem, then it would take at least 4 - 5 minutes to download a 1MB file. If you had digital subscriber line (DSL), the same 1MB file would take approximately 10 - 20 seconds.

How did you calculate my Internet connection speed?

Your Internet connection speed was calculated with 1 or 2 tests, depending on how fast your computer received the first file.

We performed the first test by sending a 150KB file to your computer and recording the amount of time it took for your computer to receive it.

If it took your computer 1.0 seconds or longer to receive the file, then the first test calculation provided your final result.

If it took your computer 1.0 seconds or longer to receive the file, then the first test calculation provided your final result.

If your computer took less than 1.0 seconds to receive the file, then we performed the second test. Based on the first test calculation, you were redirected to another Web page with either 600KB, 1.5MB or 3.0MB of data. The time it took for your computer to download that Web page was then recorded.

$$\frac{\textit{Amount of Data}}{\textit{Time to Download}} = \textbf{Your Internet Connection Speed}$$

Why were 2 tests performed?

Attachment D

big brother
CCIG

availability report
Jan 1 2010 - Jun 24 2010

	conn	cpu	disk	http	msgs	procs
uranus	■	■	■		■	■
Headstart		-	-	-	-	-
Jacobs_House		-	-	-	-	-
King		-	-	-	-	-
Council		-	-	-	-	-
Brevig-vpn	58.22	-	-	-	-	-
Diomede-vpn	74.85	-	-	-	-	-
Elim-vpn	94.05	-	-	-	-	-
Golovin-vpn	92.61	-	-	-	-	-
Koyuk-vpn	95.89	-	-	-	-	-
Savoonga-vpn	26.29	-	-	-	-	-
Shaktoolik-vpn		-	-	-	-	-
SHH-vpn	89.52	-	-	-	-	-
St_Michael-VPN	96.29	-	-	-	-	-
Stebbins-VPN	86.30	-	-	-	-	-
Teller-VPN	93.36	-	-	-	-	-
Unalakleet-vpn	94.76	-	-	-	-	-
Wales-vpn	71.30	-	-	-	-	-
White_Mountain-VPN	93.50	-	-	-	-	-

poor connections (Brevig-vpn, Diomede-vpn)

poorest connection (Savoonga-vpn)

poor connection (Wales-vpn)

■ 100% available ■ 97% and above • less than 97% No stats for period

[redacted]

Attachment E

→ Resolution File

KAWERAK, INC. ○ P.O. Box 948 ○ Nome, AK 99762

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SAVOONGA
SHAKTOOLIK
SHISHMAREF
SOLOMON
STEBBINS
ST. MICHAEL
TELLER
UNALAKLEET
WALES
WHITE MOUNTAIN

Fax to:
222-2760

April 27, 2009

Kodiak Kenai Cable Company
2702 Denali Street, Suite 100
Anchorage, AK 99503

To Whom it May Concern:

Enclosed, please find a copy of a resolution passed by the Kawerak Board in which they express their support for the proposed Northern Fiber Optic Link Project.

The proposed project will basically bring our internet system into the 21st century and enable us to provide training, counseling, and video conferencing over the internet. It will also help us to create jobs and economic opportunity in this, one of the remotest places in the United States.

We sincerely hope that this project is set in place. Please let us know if there is any way we can help make the proposed project a reality.

Sincerely,

KAWERAK INCORPORATED

Loretta Bullard
President

Attachment F

KAWERAK, INC. ○ P.O. Box 948 ○ Nome, AK 99762
TEL: (907) 443-5231 - FAX: (907) 443-4452

SERVING THE
VILLAGES OF:
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BREVIG MISSION
COUNCIL
COMEDE
ELIM
GAMBELL
GOLOVIN
KING ISLAND
KOYUK
MARY'S IGLOO
NOME

RESOLUTION 2009-~~07~~ 09

WHEREAS Kawerak, Inc. is the non-profit tribal services provider for the Norton Sound Region of Alaska; and

WHEREAS, the corporation provides services to federally recognized tribes; and

WHEREAS, Kawerak's service area covers 20 tribal governments in 20 villages across 45,000 square miles; and

WHEREAS, Kawerak's services are provided on a not-for-profit basis to approximately 9,000 people throughout our service region; and

WHEREAS, all the communities we serve are remote and isolated and accessible only by air and water; and

WHEREAS, our communities' and our own telephone and Internet needs are served only by existing satellite operations; and

WHEREAS, we are not satisfied with the quality of service from said satellite operations, including frequent and long periods of down time, slow access speeds, the inability to carry on commerce in a 21st Century fashion, lack of access for distance-education, the limitations imposed in general by satellite operations; and

WHEREAS, we are paying unreasonably high fees for substandard service, especially when compared to what is routinely available in the Lower 48; and

WHEREAS, as a tribal non-profit we would like to provide our member tribes with access to economic development services and opportunities, education and training and direct client services that is only available via high-speed and robust broadband services; and

WHEREAS, our communities have examined their needs for connectivity to the Internet and telecommunications services; and

WHEREAS, we and our tribal members desire to see a fiber optic cable landing at or near Nome, Alaska; and

WHEREAS, we and our tribes desire said fiber optic cable to be built, owned and operated by a neutral "Carrier's Carrier" to spur competition and innovation and to reduce rates for all users;

WHEREAS, we and our tribes are concerned about competing project proposals that would be owned and operated by existing commercial and retail carriers, thereby extending their monopoly or near-monopoly pricing power, and

WHEREAS, the KKCC proposal contains a proper mix of neutrality and public access features for the state and federal governments, the University of Alaska and non-profit organizations at no cost other than for basic operations and maintenance; and

WHEREAS, KKCC has demonstrated its ability to design, build and operate large fiber optic cable projects on a neutral basis, as evidenced by their success with the Kodiak Kenai Cable Link project; and

WHEREAS, we trust in KKCC's ability and team to deliver on the promises of the proposed Northern Fiber Optic Link project; and

WHEREAS, we and our tribes wish to extend our thanks, appreciation and support to the Kodiak Kenai Cable Company for offering to provide, for the first time ever, ultra high speed broadband and communications connectivity to our region thru the proposed Northern Fiber Optic Link project;

NOW THEREFORE, be it resolved that the Board of Kawerak, Inc. approves the following actions:

1) The President of Kawerak, Inc. is authorized and express our support to the Kodiak Kenai Cable Company for the fiber project and any reasonable assistance we can provide as a corporation;

2) The President is instructed to provide a copy of this Resolution and the aforementioned support letter to our Congressional Delegation in Washington, DC, to our State House and Senate Members in Juneau and to the Governor informing them of our support for the proposed KKCC project;

3) The President is authorized to assist in the negotiation of terms between parties, if necessary, to house the landing facilities needed to bring the fiber optic cable ashore at or near Nome, AK;

4) The Information Systems Manager is instructed to examine the mechanisms required to take advantage of the opportunity KKCC is providing for us to gain access to the fiber optic cable project; and

5) The Information Systems Manager or his designee is instructed to work with any and all local entities, including city councils, schools, health clinics, non-profit organizations, telephone utilities, electric utilities, chambers of commerce, fishing companies and others in the Norton Sound region to support this project.

By: _____
Robert Keith, Chairman of the Board

Certification:

I, the undersigned Secretary of the Kawerak Inc. Board of Directors, hereby certify that the foregoing resolution was adopted by majority vote of the Board of Directors of Kawerak Inc. during a duly called meeting on this 3rd day of April, 2009.

By: _____
Shirley Martin, Board Secretary